

Commonwealth Of Massachusetts

Suffolk, S.S.

Superior Court
Department Of The
Trial Court
Civil Action

No. 20-0388F

Michael A. Josey, Pro-se,
Plaintiff,

VS.

Commonwealth Of Massachusetts
Defendant.

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2020 FEB 10 10:13 AM
MICHAEL JOSEPH DONOVAN
CLERK / MAGISTRATE

COMPLAINT

I. Jurisdiction:

1.) This is a civil
action brought by the

individually named Plaintiff,
Michael A. Josey, Pro-se,
seeking to redress a
deprivation of his civil
rights a liberty interest is
at stake. The Statute
for this case is M.G.L.
ch. 2580 §1 thru 4 a negligence
claim is filed here and in
Suffolk Superior Court Civil
Action Number 10-0977-F
the case is still open and
must be dealt with.

II. Statement Of Facts:

2.) The Plaintiff,

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Michael A. Josey, filed a civil action in this Court under M.G.L. ch. 258D § 1 thru 4 the case is still open, we have a statute that went into effect December 30, 2004. A negligence claim is brought (See Suffolk Superior Court Civil Action Number 10-0977-F).

III. Cause Of Action:

3.) Negligence Claim:
Donovan V. Morris, 914 N.E.

2d 891, 455 Mass. 215
(2009), Sullivan V.

Iantosca, 569 N.E. 2d
822, 409 Mass. 796 (1991),
Parent V. Stone & Webster
Engineering, 556 N.E. 2d
1009, 408 Mass. 108 (1990).

4.) Statute:

Commonwealth V. Mattier,
50 N.E. 3d 157, at 164,
474 Mass. 261 (2016),
Commonwealth V. Diggs,
54 N.E. 3d 1115, at 1117,
475 Mass. 79 (2016).

IV. Prayer For Relief:

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5.) Wherefore, the Plaintiff prays for Relief as requested in the original complaint, and any other relief this Court might deem just proper and in the best interest of Justice. It's late in the day, it ought not take a Daniel to read the writing on the wall.

Respectfully Submitted,
/s/ Michael A. Josey
Michael A. Josey
P.O. Box 120242
Boston, MA 02112

Date: February 7, 2020